

C18-0834

RJL/cmw

May 2, 2018

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION - COLUMBUS

IN RE:) CASE NO. 18-50708
)
Brian J. Halenar) CHAPTER 13
Katie A. Halenar)
) JUDGE C. Kathryn Preston
Debtors)
) **MOTION OF AMERICREDIT FINANCIAL**
) **SERVICES, INC. DBA GM FINANCIAL**
) **FOR LEAVE TO OBJECT TO**
) **CONFIRMATION OF CHAPTER 13 PLAN,**
) **INSTANTER**

Now comes AmeriCredit Financial Services, Inc. dba GM Financial, ("Creditor") by and through its attorney and hereby moves this Court for an Order granting Creditor's leave to Object to Confirmation of Chapter 13 Plan, Instanter, and further in support thereof states as follows:

1. Creditor has a security interest in a 2011 Honda Odyssey VIN# 5FNRL5H43BB053136.

2. The Chapter 13 Plan does not provide proper treatment to the Creditor.

3. Creditor is requesting leave of this Honorable Court to file an Objection to Confirmation of Chapter 13 Plan.

WHEREFORE, Creditor requests that the within Motion be granted; that this Court enter an Order allowing Creditor to file its objection to Confirmation of Chapter 13 Plan, Instanter.

Respectfully submitted,

/s/ Richard J. LaCivita
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served (i) electronically on date of filing through the court's ECF System on all ECF participants registered in this case at the email registered with the court (ii) ordinary U.S. mail, on May 2, 2018 addressed to:

1. Brian J. Halenar
Katie A. Halenar, Debtors
9270 Huggins Ln.
Reynoldsburg, OH 43068

/s/ Richard J. LaCivita
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